

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

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SHEILA PORTER,	)	
Plaintiff	)	
	)	
v.	)	
	)	
ANDREA CABRAL, SUFFOLK	)	
COUNTY SHERIFF'S DEPARTMENT,	)	
SUFFOLK COUNTY, and	)	
CORRECTIONAL MEDICAL	)	
SERVICES, INC.	)	
Defendants	)	

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Civil Action No. 04-11935-DPW

**DEFENDANTS' MOTION FOR LEAVE TO FILE MEMORANDUM  
IN EXCESS OF TWENTY PAGES**

Now come the Defendants, Andrea Cabral, Suffolk County Sheriff's Department, and Suffolk County who move this Honorable Court for leave to file a memorandum of law in excess of the twenty page limit of L.R. 7.1(B)(4). Defendants' Memorandum in Support of their Motion for Summary Judgment is 34 pages in length. As grounds therefore, the Defendants state:

1. The Plaintiff's Amended Complaint contains a total of eleven counts and included 154 numbered paragraphs.
2. The Amended Complaint alleges constitutional violations, violations of Massachusetts' law and common law claims.
3. The number of issues raised by the Amended Complaint against the Defendants cannot adequately be addressed in a memorandum of twenty pages in the circumstances of this case.

Wherefore, Defendants respectfully request that this honorable Court grant their request to exceed the page limitations of Local Rule 7.1(B)(4) and allow them to file a twenty-eight page Memorandum in Support of their Motion for Summary Judgment pursuant to Fed. R. Civ. P. 56.

Respectfully submitted  
Andrea Cabral, Suffolk County Sheriff's  
Department and Suffolk County  
By their attorney

/s/ Ellen M. Caulo  
Ellen M. Caulo  
BBO# 545250  
Deputy General Counsel  
Suffolk County Sheriff's Department  
200 Nashua Street  
Boston, MA 02114  
(617) 961-6681

Date: October 17, 2005

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1(A)(2)**

Counsel for the Defendants hereby certifies pursuant to the requirements of Local Rule 7.1(A)(2), she has conferred with counsel for the Plaintiff **and that counsel has assented to this motion.**

/s/ Ellen M. Caulo  
Ellen M. Caulo  
Deputy General Counsel